## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA SOUTHERN DIVISION

NANCY MARTIN and, MARY BETH BRACKIN,	) )
Plaintiffs,	) )
<b>v.</b>	) Case No. 1:05-CV-1172-MEF
CITY OF DOTHAN and JUDGE ROSE EVANS-GORDON,	) )
Defendants.	) )

## MOTION FOR CONSENT PROTECTIVE ORDER

Defendants, by and through their undersigned attorneys, hereby move the Court to approve the attached Consent Protective Order, which has been agreed upon by the parties. This Motion seeks to protect the parties' interests in the confidentiality of certain proprietary, medical and sensitive documents as set forth in the parties' Consent Protective Order ("Consent Protective Order"), which is attached to Defendants' Motion as Exhibit A. The parties have agreed to the terms of the Consent Protective Order in order to maintain the confidentiality of information produced or obtained in this action and respectfully request the Court to approve and enter the Order.

Respectfully submitted,

s/ Carol Sue Nelson

Carol Sue Nelson Attorney for Defendants City of Dothan and Judge Rose Evans Gordon

## OF COUNSEL:

MAYNARD, COOPER & GALE, P.C. 1901 Sixth Avenue North 2400 AmSouth Harbert Plaza Birmingham, AL 35203-2618 (205) 254-1000 (205) 254-1999 (Fax)

## **CERTIFICATE OF SERVICE**

I hereby certify that I have on this day electronically filed the foregoing with the Clerk of Court using the CM/ECF system with a copy being served on the following:

Ishmael Jaffree, Esq. 951 Government Street Suite 415 Mobile, Alabama 36604

This the 28<sup>th</sup> day of March, 2007.

s/ Carol Sue Nelson
OF COUNSEL

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